

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION III

841 Chestnut Building . Philadelphia, Pennsylvania 19107

Mr. Robert Vernon, President Visual Packaging, Inc. 5236 Belfield Avenue Philadelphia, PA 19144

JUL 2 8 1987

Re: Belfield Avenue Site Work Plan

Dear Mr. Vernon:

Thank you for the aubmission on July 23, 1987, of the Belfield Avenue Site Work Plan ("WP"). EPA has reviewed the WP and provided copies to the City of Philadelphia (Office of the Fire Marshal, Office of the Managing Director and Department of Licenses and Inspections); the Pennsylvania Department of Environmental Resources; and the Occupational Safety and Health Administration. Based on EPA's review and consultation with the above agencies, it has been determined that the WP is consistent with the Belfield Avenue Site Consent Agreement and Order ("Order"), if the following changes/additions are made:

- Unstable portions of the exterior walls at the Site are to be stabilized or removed prior to work beginning inside the building.
- 2.) Once the walls are stable, entrance to the building should be made from the Belfield Avenue entrance. All non-hazardous and packing materials along the loading dock area should be stabilized against overturning into the street or driveway. Following this, entrance should be gained through the loading dock.
- 3.) Areas I & II should be clearly cordoned-off and a management line developed and implemented. No employees should go beyond this management line or outside Areas I & II for any reason.
- 4.) Aisles and traffic areas in Areas I & II should be cleared and swept to permit clear and safe access for workers in these areas.
- 5.) Implementation of the WP should proceed once the above four measures have been taken.
- 6.) Loose containers and bottles of product in areas I & II should be found, collected, identified, clearly labeled and shipped appropriately.

7.) EPA should be contacted when this work has been completed and the WP fully implemented. A Report should be sent to EPA upon completion of the work required in the Order detailing the dispersal of the materials and implementation of the WP.

Verbal notice of the above was provided to you on July 24, 1987, during the inspection of the facility by EPA, OSHA and the City of Philadelphia. It is EPA's understanding that you have begun the required work as of July 24, 1987.

If you have any questions, please contact me at (215)597-6678. Thank you for your continued cooperation.

Sincerely,

Bill Steureville, Environmental Scientist CERCLA Removal Enforcement Section

cc: Robert Allen, PADER
John Hadalski, City of Phila.
John Barry, OSHA
Ernest Wills, OSHA
Geoffrey Veith, Esq.